



EB 06-36  
EB-06-TC-060

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

February 6, 2006

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Graceba Total Communications, Inc.

A handwritten signature in black ink, appearing to read 'James E. Etheredge'.

James E. Etheredge  
Chief Operating Officer

cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc., via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**Certification of CPNI FILING FEBRUARY 6, 2006  
OF  
GRACEBA TOTAL COMMUNICATIONS, INC.**

**EB-06-TC-060  
EB Docket No. 06-36**

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Graceba Total Communications, Inc. ("GTC") states as follows:

1. I am an officer of GTC and this certificate is based on my personal knowledge.
2. As a small rural carrier with less than four thousand five hundred (4,500) access lines, GTC implemented the following measures to comply with the FCC rules contained in the subpart addressing CPNI for 2005:
  - (a) GTC elected to use CPNI only to market to its customers the same category of services and products that the customer currently received from GTC, which is a use that does not require customer approval in accordance with 47 C.F.R. § 64.2005;
  - (b) GTC did not turn over CPNI to any third parties in 2005;
  - (c) As a result of the request of the FCC's Enforcement Bureau, however, GTC has determined that it did the following:
    - (i) Took inbound calls from Customers who inquired about long distance services offered by GTC's affiliate, Wiregrass Telecom, Inc. and answered customer questions regarding those services. GTC is not aware, however, of an occasion that it accessed any CPNI to answer those questions.
    - (ii) Made quality assurance calls to Customers following initial installations of service, trouble reports, service outages, etc. that ended with this or a similar question: "Is there anything else that I could interest you in today?" In those isolated instances where a

customer inquired regarding the long distance services offered by GTC's long distance affiliate, Wiregrass Telecom, Inc., the GTC quality assurance caller (one designated employee) answered those questions.

- (d) If GTC uses CPNI in the future for sales and marketing campaigns it will maintain all required records, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns.
- (e) As referenced in (b) above CPNI was not disclosed to third parties in 2005, however, in the event that GTC later seeks to utilize, disclose or permit CPNI access and that includes disclosure to third parties, GTC will maintain a record of all instances where CPNI is disclosed or provided to third parties in the future, or where third parties are allowed access to CPNI. Such record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. This record shall be retained for a minimum of one year.
- (f) GTC sales personnel are required to obtain supervisory approval of any proposed outbound marketing campaign.

3. GTC has not undertaken to solicit customer approval through opt-out or opt-in mechanisms because it has only used CPNI in those instances that are permitted without customer approval in accordance with 47 C.F.R. § 64.2005. However, in the event that GTC later seeks to utilize, disclose or permit CPNI access such that customer approval is required, GTC will, if it utilizes an opt-out method, provide written notice within five business days to the Commission of any future instance where the opt-out mechanisms do not work properly, except when such incident is isolated and an anomaly.

4. GTC plans to adopt additional procedures to ensure familiarity and compliance with the Commission's CPNI rules in the event that it should later decide to utilize, disclose or permit access to CPNI for any purpose that requires customer approval.

Graceba Total Communications, Inc.

By: 

James E. Etheredge

Its: Chief Operating Officer

DATED: 2/6/2006